

EXHIBIT 6

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRITAX CHILD SAFETY, INC.,

Plaintiff,

v.

NUNA INTERNATIONAL B.V. AND NUNA
BABY ESSENTIALS, INC.,

Defendants.

Civil Action No. 5:17-cv-02724-JFL

JURY TRIAL DEMANDED

**DEFENDANT’S OBJECTIONS AND RESPONSES TO
BRITAX’S FIRST INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Nuna International B.V. (“Nuna BV”) objects and responds to the First Interrogatories for Production (Nos. 1-15) of Plaintiff Britax Child Safety, Inc. (“Britax”).

GENERAL OBJECTIONS AND QUALIFICATIONS

Nuna BV objects to Britax’s instructions, definitions, and Interrogatories on the following grounds:

1. Nuna BV objects to Britax’s First Interrogatories (“Interrogatories”) to the extent they seek to impose on Nuna BV any obligations or responsibilities other than those required by the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Eastern District of Pennsylvania (“Local Rules”) or any standing orders of the Court.

2. Nuna BV objects to Britax’s Interrogatories to the extent they are overly broad, unduly burdensome, or seek documents or information neither relevant to any claim or defense nor reasonably calculated to lead to the discovery of admissible evidence and/or seeks information outside the scope of permissible discovery pursuant to the Local Rules, or the

CONFIDENTIAL

that it has identified the individuals most knowledgeable about the sales of the Nuna RAVA as part of its Initial Disclosures and incorporates its Initial Disclosures by reference.

Nuna BV reserves the right to supplement and/or amend these responses pursuant to Federal Rule of Civil Procedure 26(e) and the Local Rules of the Eastern District of Pennsylvania.

INTERROGATORY NO. 14

Describe in detail all activities and circumstances known to you relating to the availability of any non-infringing alternative to any claim of any of the Asserted Patents. In so doing, please identify each element of each claim of the Asserted Patents that you contend is missing from each such non-infringing alternative and the date you became aware of the noninfringing alternative.

RESPONSE TO INTERROGATORY NO. 14

Nuna BV objects to this Interrogatory as comprising multiple discrete interrogatories under the guise of a single interrogatory. Nuna BV objects to this Interrogatory to the extent it seeks the production of documents or information protected by the attorney-client privilege and/or work product immunity. Nuna BV objects to this Interrogatory as overly broad, unduly burdensome, not relevant to any claim or defense and not reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks non-infringing alternatives to “any claims of any of the Asserted Patents.” Nuna BV objects to this Interrogatory to the extent it calls for an admission or legal conclusion, particularly with respect to the terms “non-infringing alternative” and “noninfringing alternative,” which are more appropriately obtained through other means. Nuna BV also objects to this Interrogatory as depending on the construction of claim terms that have not yet been construed by the Court and as premature to the extent it seeks Nuna BV’s noninfringement contentions and/or claim constructions and/or expert disclosures before the deadlines set forth in the Federal Rules, Local Rules, protective order, case management plan,

CONFIDENTIAL

and/or discovery order(s) as applicable in this case. Nuna BV further objects to this Interrogatory to the extent it seeks information concerning commercial, financial, regulatory, marketing or legal documents concerning child car seats sold outside of the United States.

Subject to and without waiving the foregoing general and specific objections, Nuna BV will provide its non-infringement contentions and expert disclosures according to a schedule issued by the Court. Nuna BV is open to meeting and conferring with Britax on a schedule to propose to the Court that includes appropriate dates for the exchange of contentions and expert disclosures.

INTERROGATORY NO. 15

Identify each person, other than counsel, who was consulted or who provided information in connection with the response to each Interrogatory.

RESPONSE TO INTERROGATORY NO. 15

Nuna BV objects to this Interrogatory as comprising multiple discrete interrogatories under the guise of a single interrogatory. Nuna BV objects to this Interrogatory to the extent it seeks the production of documents or information protected by the attorney-client privilege and/or work product immunity. Nuna BV objects to this Interrogatory as overly broad, unduly burdensome and duplicative of the above interrogatories that request identification of “each person, other than counsel, who has knowledge of or documents relating to the response to this Interrogatory.”

Subject to and without waiving Nuna BE’s objection that this request calls for information subject to the work product immunity, to which Nuna BE objects, subject to and without waiving the foregoing general and specific objections, Nuna BV responds it has identified the individuals most knowledgeable about these responses within its Initial Disclosures and incorporates those Initial Disclosures by reference.

CONFIDENTIAL

Nuna BV reserves the right to supplement and/or amend these responses pursuant to Federal Rule of Civil Procedure 26(e) and the Local Rules of the Eastern District of Pennsylvania.

Respectfully submitted,

NUNA INTERNATIONAL B.V. and NUNA
BABY ESSENTIALS, INC.

Dated: May 24, 2019

By: /s/ Gary C. Ma

Gary C. Ma
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
901 New York Avenue NW
Washington, D.C. 20001-4413
(404) 653-6452

Roger D. Taylor, Georgia Bar No. 342927
roger@taylorfirm.law
LAW OFFICE OF ROGER TAYLOR, LLC
531 Roselane St., NW, Suite 200
Marietta, GA 30060
Phone: (770) 331-8733

*Attorneys for Defendants Nuna International B.V.
and Nuna BabyEssentials, Inc.*

CONFIDENTIAL